

DECLARATION OF JUANITA GOEBERTUS,

I, Juanita Goebertus, declare as follows:

1. I am the Director of the Americas Division of Human Rights Watch and have worked with the organization since 2022. I hold BAs in Law and Political Science from the Universidad de los Andes (Colombia) and an LLM from Harvard Law School. I oversee Human Rights Watch's work on El Salvador and have traveled to the country several times, most recently in 2024. I provide this declaration based on my personal knowledge and experience as well as the information conveyed to me from my staff and colleagues.
2. In November 2025, Human Rights Watch and the Central American human rights group Cristosal published a report titled "You Have Arrived in Hell," documenting systematic torture and other abuses inflicted on the 252 Venezuelans sent by the United States to El Salvador in March and April 2025, where they were detained for approximately four months in the Center for Terrorism Confinement (Centro de Confinamiento del Terrorismo, CECOT) in Tecoluca, El Salvador.¹ Human Rights Watch interviewed 40 of the Venezuelans who were detained in CECOT after the government of El Salvador transferred all of them to Venezuela on July 18, 2025, pursuant to an agreement with the Venezuelan government. Human Rights Watch also interviewed 150 relatives, lawyers, and acquaintances of the Venezuelans detained; reviewed photographs of injuries, criminal records, and judicial documents in El Salvador and the United States; and consulted international forensic experts.
3. The Venezuelans we interviewed said that they were told by an immigration judge or a DHS official that they were going to be sent to Venezuela, but none were informed prior to their removal that they would be sent to El Salvador.
4. As documented in "You Have Arrived in Hell," from the moment the Venezuelans arrived in El Salvador and throughout their detention in CECOT, they were subjected to regular, severe physical and psychological abuse by Salvadoran prison guards and riot police. This included routine beatings, prolonged confinement in cells without mattresses or privacy for toilets, constant illumination, lack of ventilation or natural light, use of the same unsanitary water for drinking and bathing, and deprivation of food and water as a form of punishment. Medical care was limited or denied. The Venezuelans also reported being held in dark isolation cells for extended periods, and the use of restraints combined with physical abuse. Three people reported that they were subjected to sexual violence. Hunger strikes and other protests of ill-treatment were met with excessive force,

¹ HUMAN RIGHTS WATCH & CRISTOSAL, "YOU HAVE ARRIVED IN HELL": TORTURE AND OTHER ABUSES AGAINST VENEZUELAN IN EL SALVADOR'S MEGA PRISON (2025), <https://www.hrw.org/report/2025/11/12/you-have-arrived-in-hell/torture-and-other-abuses-against-venezuelans-in-el>.

including firing rubber pellets at close range. Interviewees also described routine verbal and psychological abuse, including being told that they would “never leave alive.” Four of them said they experienced suicidal thoughts. At least one detainee attempted suicide.

5. One of the Venezuelans we interviewed, a 23-year-old from Caracas, described their arrival to El Salvador, saying that as soon as he was called off the plane, a hooded unidentified officer punched him in the stomach, handcuffed his hands and feet, and pushed him down the stairs toward a bus. When he and others got off the bus at the CECOT entrance, officers made them crouch down and run while handcuffed. He shouted to officers that he couldn’t keep running because he was asthmatic and was going to faint. When he fell to the ground, an officer kicked him in the chest and said “Here, we beat those who faint even harder.” The officer forced him and others to kneel on the floor as officers punched them in the backs of their necks, calling them “fucking gang members,” and ordering them to take off all their clothes.

6. While in CECOT, the Venezuelans were beaten during daily cell searches, for allegedly violating the prison’s often arbitrary rules, for requesting medical attention, and for protesting the beatings. Many detainees were also beaten after official visits, including by U.S. Secretary of Homeland Security Kristi Noem in March 2025 and by the International Committee of the Red Cross (ICRC) in May and June 2025. According to the former detainees interviewed by Human Rights Watch, the most severe beatings and abuses took place on the way to or inside the punishment cells known as “the Island.” Guards took detainees there to punish or intimidate them, often under the pretext that they had violated prison rules.

7. One of the former detainees, a 24-year-old from Miranda State, Venezuela, described how officers beat him after he spoke with ICRC staff members during their visit to CECOT in May. He said guards took him to “the Island,” where they struck him in the face with a baton, causing his nose to bleed. “They kept hitting me, in the stomach, and when I tried to catch my breath, I started to choke on the blood,” he said. He shared with Human Rights Watch a photo of his nose, which a forensic expert said was consistent with his description of the beatings.

8. Another former detainee said he was taken to “the Island” 12 times in five days as punishment for one of the detainees’ protests. The first time, he said that officers took him and about 24 others to the hallway in front of the punishment cell. “They left us [there], handcuffed behind our backs and kneeling, and then took us one by one to ‘the Island,’ where they beat us all. I could hear the screams of my cellmates.” The following morning, officers took him to “the Island” to beat him again. He said they beat him with a baton on his face, and broke one of his teeth. He shared a photo with Human Rights Watch of his mouth, which a forensic expert said was consistent with his description of

the beatings. He recalled passing out and said that when he regained consciousness, his face was covered in blood.

9. Another Venezuelan, a 25-year-old from Caracas, described one incident when officers beat him for laughing with his cellmates. Four officers took him out of the cell in handcuffs and dragged him across the floor, he said. They punched him, kicked him, and rolled him around. He said a guard took him to the infirmary as he started to vomit blood.

10. Another former detainee, a 27-year-old man from Apure State, Venezuela, described being beaten for requesting medical care to address sharp pain in both of his ears. After asking for medical attention for days, officers took him to the infirmary. Medical staff told him he had an infection and pus in both ears. He was not given any medication or antibiotics, he said. After returning to his cell, he pressed himself against the bars of the cell and continued to ask officers for medication. Four guards took him out of the cell, brought him to the hallway, and beat him for several minutes in the back, stomach, and legs. They hit him with handcuffs and batons and kicked and punched him in the chest, he said. “They beat me until I vomited blood.” Officers then locked him in a punishment cell for three days.

11. During their four months in detention, the Venezuelans reported that they were denied access to legal assistance or contact with the outside world. Despite repeated requests from several detainees, guards never allowed them to make phone calls to their relatives or lawyers.

12. El Salvador transferred all 252 Venezuelans held in CECOT to Venezuela on July 18, 2025. At least 19 of them had reportedly fled Venezuela to escape threats, abuses, or persecution by state security forces, as well as threats posed by armed and criminal groups, including Tren de Aragua. After arriving back in Venezuela, two former detainees said that agents of Venezuela’s National Intelligence Service (Servicio Bolivariano de Inteligencia Nacional, SEBIN) visited them in their homes. The agents reportedly said that the visits were “part of a monitoring process” and asked the former detainees to record videos about their detention in the United States and the treatment they received. The agents also asked them, among other questions, whether they had connections with U.S. agencies seeking to “destabilize the [Venezuelan] government.”

13. Until the Venezuelans were transferred to Venezuela in July 2025, Human Rights Watch was not aware of any detainees who had been released from CECOT, aside from Kilmar Abrego Garcia, a Salvadoran living in the United States who was sent to El

Salvador on March 15 and flown back to the United States on June 6 following a U.S. court order to facilitate his return after he was wrongfully removed.²

14. The mistreatment of the Venezuelan detainees at CECOT is in large part similar to what Human Rights Watch had previously documented in other prisons in El Salvador, including Izalco, La Esperanza (Mariona) and Santa Ana prisons. This includes cases of torture, ill-treatment, incommunicado detention, severe violations of due process and inhumane conditions, such as lack of access to adequate healthcare and food.

15. These practices were publicly known prior to March 2025. Human Rights Watch as well as other human rights organizations have reported on human rights abuses in El Salvador's prisons for years. And the U.S. Department of State 2023 report described prison conditions in El Salvador as "harsh and life threatening" and also acknowledged credible reports of "torture or cruel, inhuman, or degrading treatment or punishment by security forces."³

16. In December 2022, Human Rights Watch and Cristosal published a joint report, "We Can Arrest Anyone We Want," documenting widespread abuses in the country's prisons.⁴ Cristosal has reported that abusive prison conditions have led to the deaths of at least 419 detainees since 2022. In July 2024, Human Rights Watch published a report titled "Your Child Does Not Exist Here," documenting abuses committed against children during the state of emergency, including 66 cases of children subjected to torture, ill-treatment and appalling conditions, including at times extreme overcrowding, unhygienic conditions, and inadequate access to food and medical care while in custody.⁵ In a separate Human Rights Watch report from February 2020, titled "Deported to Danger," Human Rights

² Pet. for Writ of Habeas Corpus at 8-9, *Abrego Garcia v. Noem*, 8:25-cv-02780 (D. Md. filed Aug. 25, 2025).

³ U.S. DEP'T STATE, BUREAU OF DEMOCRACY, HUMAN RIGHTS, AND LABOR, COUNTRY REPORTS ON HUMAN RIGHTS PRACTICES—2023: EL SALVADOR (2024), <https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/el-salvador/>.

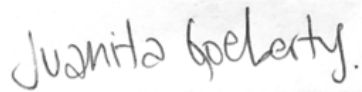
⁴ HUMAN RIGHTS WATCH, "WE CAN ARREST ANYONE WE WANT": WIDESPREAD HUMAN RIGHTS VIOLATIONS UNDER EL SALVADOR'S "STATE OF EMERGENCY" (2022), <https://www.hrw.org/report/2022/12/07/we-can-arrest-anyone-we-want/widespread-human-rights-violations-under-el#3683>.

⁵ HUMAN RIGHTS WATCH, "YOUR CHILD DOES NOT EXIST HERE": HUMAN RIGHTS ABUSES AGAINST CHILDREN UNDER EL SALVADOR'S "STATE OF EMERGENCY" (2024), <https://www.hrw.org/report/2024/07/16/your-child-does-not-exist-here/human-rights-abuses-against-children-under-el>.

Watch investigated and reported on the conditions in Salvadoran prisons experienced by Salvadoran nationals deported by the United States.⁶

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 5th day of December 2025 in Villa de Leyva, Colombia.

A handwritten signature in dark ink, reading "Juanita Goebertus." The signature is written in a cursive, slightly slanted style.

Juanita Goebertus

⁶ HUMAN RIGHTS WATCH, DEPORTED TO DANGER: UNITED STATES DEPORTATION POLICIES EXPOSE SALVADORANS TO DEATH AND ABUSE (2020), <https://www.hrw.org/report/2020/02/05/deported-danger/united-states-deportation-policies-expose-salvadorans-death-and>.